

# Snap Inc.

The Honorable Marsha Blackburn  
United States Senate  
357 Dirksen Senate Office Building  
Washington, DC 20510

July 17, 2019

Dear Senator Blackburn:

Thank you for your letter regarding online child safety practices. We are deeply committed to the safety and privacy of Snapchat's community and appreciate the opportunity to share our safety practices and content policies. Our mission has always been to encourage creativity and learning while making sure Snapchatters can use our services safely. We are committed to working with you and other policymakers to ensure Snapchat remains a safe place for our community.

Snapchat is different than other social platforms. Here are a few reasons why: *First*, we do not offer common aspects of social networking, such as a profile photo, a catalogue of a user's historical posts, a feed with "likes" and comments, or a mechanism for making content go viral. *Second*, we intentionally make it harder to find people on Snapchat than on other platforms, because we want to encourage users to interact only with their real friends. *Third*, by default, you cannot receive a message on Snapchat from someone who is not already your friend. *Fourth*, location sharing is off by default, and there is no option on Snapchat to share your location with anyone other than your friends. *Fifth*, we curate our publicly viewable "Discover" publishers; Discover is not an open platform. Taken together, these Snapchat features help protect our users' privacy and enhance their safety. These features also make it difficult for inappropriate accounts to flourish, and for predators to use the platform to identify, much less meet, our younger users.

All of that said, we are committed to doing more. We constantly adapt and improve our products by listening to our community, seeking guidance from experts and working constructively with regulators and legislators in the US and internationally. And we want to work with you to better understand your perspective and address the issues you have raised.

Below I describe in greater detail how and why Snapchat is different. I specifically describe some of the products mentioned in your letter, such as Discover and Snap Map, and then share some of our key privacy and safety policies before addressing your specific questions. I hope you find this information helpful and we are grateful for the opportunity to engage with you and your team.

## **Snapchat is Different**

We built Snapchat as an antidote to traditional social media and we extend this approach to everything we do. The design of Snapchat encourages users to interact with their real friends, not strangers. Snapchat opens straight to the camera, which encourages you to talk with pictures, framing the actual moments you experience. There is no feed where strangers compete to post the most “perfect” content. Content posted on Snapchat cannot be reacted to with public comments or likes, which reduces social pressure and stranger interactions.

Snapchat does not have browsable public profiles and unlike on other social platforms, people on Snapchat cannot see each other’s friend lists or how many people view each other’s Stories. Critically, by default, you cannot receive a message on Snapchat from someone you haven’t already added as a friend on the application. And, importantly, for a safety-sensitive feature like Snap Map, location sharing is off by default and there is no option for users to share their location with anyone except their own friends.

## **Privacy-By-Design**

We consider the impact on user data from the outset when developing new products. “Privacy-by-design” is both a program and a philosophy we live by at Snap. All participants in the creation of a new product or feature, from the product and privacy engineers to the designers and lawyers, collaborate in considering the privacy and safety of Snapchatters while the product or feature is being designed and built. Our products and features are designed to collect and store as little data as possible and all data is assigned a short retention period. Snapchatters are given access to almost all of their data – to control and/or delete right from app – and they can also download that data right from the app.

At Snap, we don’t stockpile private messages or publicly and perpetually share a history of everything our users have created. Protecting the privacy of personal communication is critical to everything we do.

Ephemeral messaging, a core part of our platform, is meant to encourage natural, spontaneous conversation, the kind you would have off-line with a close friend. And it is a defense against the increasingly ubiquitous and permanent digital records created by people in other apps that may follow them for the rest of their lives. But it is important to note that despite our commitment to ephemerality, Snapchat has records that can and do help law enforcement. The metadata that we collect has helped law enforcement in many investigations. Moreover, as we will describe in the next section, we often have content to provide National Center for Missing and Exploited Children (NCMEC) and law enforcement, because when child sexual abuse imagery or other illegal content is reported on Snapchat, we preserve it.

## **Trust & Safety Policies**

We have zero tolerance for illegal or harmful content on Snapchat and clearly illustrate the types of content that are not acceptable in our [Community Guidelines](#) and [Terms of Service](#). Snap's approach to Trust & Safety is characterized by four main pillars: Prevention, Action, Response and Partnership.

*Prevention* means stopping abuse before it can happen and is anchored by a "Safety-by-Design" program to anticipate and prevent the opportunity for abuse before it can happen. Safety-by-Design for Snap is a multi-pronged approach, and is architected into our products and features right from the start. We also utilize certain non-public algorithmic and technological tools to catch abuse before it happens.

*Action* gives users the ability to control their experience in the moment. This control includes user-controlled settings and in-app abuse reporting. These not only give our users the ability to manage their Snapchat environment, but also take action on inappropriate content when it appears.

*Response* is our reactive review and response to abuse reports from Snapchatters and law enforcement. The in-app process preserves the reported content for a longer time, despite the ephemeral nature of Snapchat messages, allowing for time to investigate the concern and share with law enforcement as appropriate. The Trust & Safety team works around the clock to lead investigations, review reports, and enforce our policies. In nearly all cases, the team takes action on these reports and concerns within 24 hours, with the vast majority occurring within 2 hours.

Lastly, *Partnership* includes educational outreach and relationships. In addition to working with law enforcement agencies, we collaborate with expert not-for-profit organizations like ConnectSafely, Crisis Text Line, Family Online Safety Institute, and the Social Media Helpline for Schools to make sure Snapchat is a safe environment for our users. Many of these leading safety advocates advise us on our Safety Advisory Board. They provide valuable insights that guide our policies and product development. We also provide in-app direct access to services like Crisis Text Line for people who indicate that they are experiencing a crisis. Within our [Safety Center](#), parents, teachers, and users can find safety tips, research, and resources on how to stay safe on our platform.

## **Discover Content**

Our Discover section is a curated portal for professional media publishers such as ESPN, National Geographic, CMT, and the Food Network to publish global and regional news and

current events for our community. Discover is a closed platform: Trusted media companies are vetted by Snap before they can appear in the Discover section. These media partners must comply with content guidelines, which make clear the quality and standards of content allowed on Discover. We are one of the only platforms to hire professional journalists to curate stories in Discover about world events, from elections to natural disasters to breaking news. As a result of these investments and the way we have built Discover, we have been able to protect against the spread of disinformation by untrusted content creators.

In November 2018, we updated our publisher-facing guidelines and made clear to our partners that we would be taking swifter action against content that violates those guidelines. We also reiterated the requirement to age-gate any content not appropriate to audiences under the age of 18. We are in the process of piloting new tools that will enable us to notify publishers of violative content even more quickly.

Earlier this year, the National Center on Sexual Exploitation sent a letter thanking Snap for making a number of improvements to the Snapchat application. The letter specifically identified improvements to Discover, including allowing Discover publishers to age-gate content and allowing users to hide specific publishers from appearing on their Discover feed. Still, we recognize that there is more we can do to continue to improve our Discover content and ensure that it is appropriate for our community.

## **Snap Map**

Snap Map is an interactive map that shows Snapchatters what's happening nearby and around the world, including sporting events, cultural celebrations, and breaking news. The map is anchored by the Bitmojis of each Snapchatters' friends who have specifically chosen to share their locations with them. There is no option for Snapchatters to share their location with anyone who is not already their friend. The first time someone uses Snap Map, a tutorial explains how to opt-in to share one's location with specific friends or all friends.

On Snap Map, location-sharing is off by default. Indeed, even if a Snapchatter has already granted Snapchat location permission because he or she has used another location-based feature of Snapchat, location-sharing on Snap Map is still off by default. Additionally, Snapchat does not collect "background" location data, so if a user leaves the Snapchat app, their location on the Snap Map will not update and they will disappear from the map approximately 8 hours after they were last using Snapchat.

During the development of Snap Map, our privacy lawyers and engineers carefully architected the design of the tutorial, the notices Snapchatters would see, the name of the setting (i.e., Ghost Mode), location blurring for sparsely populated areas and other safety aspects of the product

design. This was to ensure that it would be understood by all Snapchatters (even our younger users), so they could make informed choices about whether to use the feature, whether to share their location and, if so, with whom to share it.

## **Responses to Specific Questions**

### **1. What is Snapchat doing to ensure that predators do not assume false identities in order to elicit sexual or provocative images from minors?**

Snapchat is designed to make it very difficult for predators to identify and meet our younger users. Potential predators cannot browse for users to target with messages or “stalk” users by viewing their locations. We are concerned predators are using other, less private, apps to locate potential victims and then steer them to Snapchat or other private messaging platforms. We are working hard to better understand this activity and are collaborating with law enforcement and other industry partners to develop more ways to combat this behavior.

We take steps to combat child sexual abuse imagery from Snapchat with the use of PhotoDNA technology, which allows us to identify such content and report it to the National Center for Missing and Exploited Children (NCMEC) and law enforcement. The technology uses a hash bank database of Child Sexual Abuse Imagery (CSAI) shared industry-wide by NCMEC and peer companies. Advances in this type of detection technology have increased our ability to further crack down on abuse and exploitation of children and report violations to NCMEC and law enforcement.

Additionally, we are developing machine learning-driven tools to help us identify keywords and account behaviors that suggest abusive accounts or other suspicious activity. We intend to use these signals to flag high-risk accounts for suspicious activity review and will continue to aggressively develop this capability.

### **2. What policies has Snapchat considered as it pertains to regulating the advertisements seen by minors, the channels that appear in the “Discover” section, and the prohibitions on minors from subscribing to pornographic channels? Please address each of these three areas separately.**

***Advertisements.*** Our advertising policies require advertisers to be honest about the products or services their ads promote. They also must avoid content that misleads or offends, and they must never compromise our users’ privacy. Advertisers must comply with Snap’s Terms of Service and Community Guidelines, our [Ad Policies](#) and all other Snap policies governing the use of our services.

Our policies require advertisers to either (a) ensure that their ads are suitable for Snapchatters aged 13+ in each geographic area where the ads will run or (b) age-gate their ads so they cannot be viewed by younger users. Snap has a number of mechanisms in place to limit the types of ads we show to specific categories of users. We rigorously enforce our policies with advertisers to age-gate ads that should be targeted to more mature audiences.

***Discover.*** As described above in this letter, in November 2018, we updated our publisher-facing content guidelines and made clear to our partners that we would be taking swifter action against violative content. As part of these guidelines, publishers are prohibited from publishing content that is sexually explicit or obscene. We also reiterated the requirement to age-gate any content that is not appropriate for audiences under the age of 18. We are in the process of testing new tools that will notify publishers even more quickly of content that violates our guidelines.

***Pornographic accounts.*** Pornography of any kind is patently against Snapchat's Terms of Service and Community Guidelines, no matter the age of the user. We swiftly remove any account distributing pornography as soon as the content is flagged to us. We are actively exploring new ways to identify and remove these violating accounts.

Moreover, Snapchat's design discourages the proliferation and discovery of pornography on the app. For example, pornographic accounts cannot appear in the public "Discover" section of the app because, as mentioned, Discover is a closed platform. Likewise, there is no mechanism for content on Snapchat to become viral. And there is no mechanism for making payments to other users in the application; indeed, as the National Center on Sexual Exploitation noted, Snapchat removed a feature that previously allowed Snapchatters to send each other payments. That lack of a payment mechanism disincentivizes distribution on the platform. While violations of our rules against pornography do occur, and we are committed to rooting them out, we believe the features just mentioned make Snapchat a fundamentally unattractive platform for most purveyors of pornographic material.

**3. Does Snapchat intend to provide parents with more controls to monitor what their minors send, receive, and view on Snapchat? If so, how? If not, why not?**

Snap is increasing its investment in user and parent education, providing Snapchatters with in-app controls over their experience on Snapchat, and refining our products to make an even safer experience. Our Safety Center, available in the app and on the web, houses our Parent's Guide to Snapchat – a guide written to enable transparent conversations between people in positions of authority (parents, educators and law enforcement) and minors about using Snapchat features. In addition to that, by design, Snapchat honors device-level controls and functionality set by parents. Thus, for instance, our users cannot access websites through Snapchat that are already restricted on their device.

In June, *Family Circle* magazine published an article explaining why parents can sleep soundly when their teen is on Snapchat.<sup>1</sup> The article praised Snapchat for working with the best experts to create resources to ensure a safe environment. We will continue to invest in new ways to educate our community, parents, teachers, and law enforcement.

**4. Does Snapchat intend to change its app descriptions on the Apple App Store and Google Play Store that will more accurately describe the availability of frequent and explicit sexual content and nudity on the platform? If so, how? If not, why not?**

The content we make available to our users in our Discover page is not permitted to include explicit sexual content or nudity. Pornography of any kind violates our Community Guidelines, and we take swift action against any account that is engaged in such a violation as soon as we are aware of it. We will continue to work hard to enforce our strong policies and expand our reviews to include non-Snapchat platforms to ensure this type of content is not available.

Moreover, it is important to note that Snapchat is a general audience service designed to appeal to teen and adult audiences. Children under 13 are prohibited from using Snapchat as referenced in Snapchat's Terms of Service. Snapchat is not available in the "Kids" or "Family" sections of any app store. Snapchat is rated 12+ in the Apple app store (only because Apple doesn't provide a 13+ designation) and rated Teen in the Google Play store, putting parents on notice that Snapchat is not designed for children. These ratings reflect Snapchat's content, which is designed for teens and adults, and not children under 13 years of age.

The Children's Advertising and Review Unit (CARU) recently examined Snapchat's compliance with CARU's guidelines as well as with the Children's Online Privacy Protection Act (COPPA). CARU concluded that Snap makes no efforts to market Snapchat to children or make the user experience appealing to them. CARU also concluded that Snapchat utilizes many safeguards to ensure that if children do breach the age gate, they will not be able to remain active on the app.

**5. Does Snapchat's revenue model and user growth depend on attracting young users under the age of 18?**

Snap's revenue model does not depend on attracting users under the age of 18. Snap's revenue model is primarily focused on digital advertising. In general, older demographics are more valuable for advertisers to reach, so advertisers pay more to reach them. Around 80% of Snapchatters in the United States are already 18 or over, so most of Snapchat's advertising

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<sup>1</sup> Caroline Mullin, *How to Sleep Soundly When Your Teen is on Snapchat*, Family Circle (June 2019), <https://www.familycircle.com/teen/how-sleep-soundly-when-your-teen-snapchat/>

revenue today comes from these older users. And as Snapchat looks for opportunities to further grow its ad revenue, it has every incentive to focus on these more valuable older demographics.

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Thank you for your commitment to the safety of children, which we share, and for the opportunity to respond to your concerns. We hope you found the above information helpful, but should you have any additional questions, please do not hesitate to contact me.

Best regards,

/s/ Jennifer Stout

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